# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA FORT MYERS DIVISION

LINDA FAIRSTEIN,	)
Plaintiff,	) Case No:
v.	)
NETFLIX, INC., AVA DUVERNAY, and ATTICA LOCKE,	) ) )
Defendants.	)

#### MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Local Rule 2.02 of the United States District Court for the Middle District of Florida, Plaintiff Linda Fairstein files this motion requesting the admission *pro hac vice* of Attorney Kara Gorycki. The grounds upon which this motion is based are as follows:

- Kara Gorycki practices with the law firm of Nesenoff & Miltenberg, LLP, in New York, New York.
- 2. Kara Gorycki does not appear regularly in this Court to such a degree as to constitute the regular practice of law in the State of Florida.
- 3. Kara Gorycki is a member in good standing and admitted to practice law in the following jurisdictions: New York State, United States District Court for the Southern District of New York, United States District Court for the Eastern District of New York, United States District Court for the Northern District of New York, United States District Court for the District of Colorado, United States Court of Appeals for the Second Circuit, and the United States Court of Appeals for the Fourth Circuit.

4. Kara Gorycki is familiar with the Local Rules and the Code of Professional

Responsibility of this Court and agrees to abide by them, as well as other ethical limitations or

requirements governing the professional behavior of members of the Florida Bar.

5. Attorneys Edward K. Cheffy, Rachael S. Loukonen, and Kimberly D. Swanson,

each of the law firm of Cheffy Passidomo, P.A., 821 Fifth Ave. S., Suite 201, Naples, FL 34102,

have been designated as local counsel for Plaintiff Linda Fairstein, upon whom all notices and

papers may be served, and who will be responsible for the progress of the case, including trial,

along with Kara Gorycki.

6. Pursuant to Local Rule 2.02(a), Edward K. Cheffy certifies that Kara Gorycki has

complied with the fee requirements of Local Rule 2.01(d) and will complete the e-filing

registration.

WHEREFORE, Plaintiff Linda Fairstein, requests that Attorney Kara Gorycki be admitted

pro hac vice pursuant to Local Rule 2.02 of the United States District Court for the Middle District

of Florida.

Respectfully submitted,

CHEFFY PASSIDOMO, P.A.

By: <u>/S/ EDWARD K. CHEFFY</u>

Edward K. Cheffy

Florida Bar No. 393649

Rachael S. Loukonen

Florida Bar No. 668435

Kimberly D. Swanson

Florida Bar No. 1018219

821 Fifth Avenue South

Naples, Florida 34102

(239) 261-9300

ekcheffy@napleslaw.com

rloukonen@napleslaw.com

kdswanson@napleslaw.com

#### -and-

### NESENOFF & MILTENBERG, LLP

## By: <u>/S/ KARA GORYCKI</u>

Kara Gorycki (pro hac vice admission pending) 363 Seventh Avenue, Fifth Floor New York, New York 10001 (212) 736-4500 kgorycki@nmllplaw.com